

Entered on Docket
February 03, 2021
EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA



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Signed and Filed: February 3, 2021

DENNIS MONTALI
U.S. Bankruptcy Judge

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15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 In re:

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC COMPANY,**

22 **Debtors.**

23 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

24 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

25 Case No. 19-30088 (DM)
26 Chapter 11
27 (Lead Case)
28 (Jointly Administered)

**ORDER APPROVING
STIPULATION PERMITTING
ROBERT O'BRIEN ET AL. TO
AMEND PREVIOUSLY FILED
PROOF OF CLAIM**

1 The Court having considered the *Stipulation Permitting Robert O'Brien et al. to Amend*
2 *Previously Filed Proof of Claim*, dated February 2, 2021 [Dkt. No. 10079] (the “**Stipulation**”),¹
3 entered into by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
4 “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
5 Plan, the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on
6 the one hand, and Robert O'Brien, Mary Ellsworth, M.O. (a Minor), K.O. (a Minor), and Joshua
7 Ellsworth (collectively, the “**Movants**”), on the other hand; and pursuant to such Stipulation and
8 agreement of the Parties, and good cause appearing,

9 IT IS HEREBY ORDERED THAT:

10 1. The Stipulation is approved.

11 2. Movants are permitted to file a proof of claim (the “**Amended Proof of Claim**” and,
12 together with the Original Proof of Claim, the “**Proofs of Claim**”) amending the Original Proof of
13 Claim, to add Mary Ellsworth, M.O. (a Minor), K.O. (a Minor), and Joshua Ellsworth as
14 additional claimants, on the condition that the Amended Proof of Claim shall be filed no later than
15 seven (7) days after the entry of any Order approving the terms of this Stipulation.

16 3. The Proofs of Claim and the Asserted Fire Victim Claims shall for all purposes be
17 treated and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the
18 sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be
19 administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in
20 accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution
21 Procedures. Movants shall have no further recourse against the Debtors or Reorganized Debtors,
22 as applicable, with respect to the Proofs of Claim or the Asserted Fire Victim Claims.

23 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
24 Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to

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27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than the untimely
2 filing thereof.

3 5. Nothing herein shall be construed to be a waiver by Movants of their rights to assert
4 any right in contravention to or in opposition of any asserted challenge to the Asserted Fire Victim
5 Claims or the Amended Proof of Claim.

6 6. Upon the timely filing of the Amended Proof of Claim pursuant to paragraph 2 of this
7 Order, the Original Proof of Claim shall be deemed expunged, and Prime Clerk LLC, the claims
8 agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims register to
9 reflect the terms set forth herein.

10 7. *The Motion to Amend Proof of Claim No. 28994 Filed by Robert O'Brien, or
11 Alternatively, for the Allowance of a Late-Filed Claim [Dkt. No. 10058]* is deemed withdrawn with
12 prejudice, and the Hearing vacated.

13 8. The Stipulation is binding on the Parties and each of their successors in interest.

14 9. The Stipulation constitutes the entire agreement and understanding of the Parties
15 relating to the subject matter hereof and supersedes all prior agreements and understandings relating
16 to the subject matter thereof.

17 10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
18 controversies arising from this Order or the Stipulation.

19 *** END OF ORDER ***

20 Dated: February 2, 2021

21 GRIMSHAW LAW GROUP

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23
24 /s/ Matthew W. Grimshaw
Matthew W. Grimshaw, Esq.

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26 *Attorneys for Robert O'Brien individually and as
guardian ad litem for M.O. (a Minor) and K.O. (a
Minor); Mary Ellsworth; and Joshua Ellsworth*